

REMARKS

The Office Action dated December 9, 2009 for this Application has been carefully considered. Claims 1-27 were previously pending. Claims 2, 4-6, 12-13, 16 and 20-25 have been previously withdrawn. Claims 1-7, 9, 11-12, and 14 are currently amended. Claims 8, 10-11, 15, and 17-19 have been previously presented. Claims 26 and 27 are cancelled without prejudice or disclaimer. Dependent Claims 28-29 are new.

Reconsideration and allowance are respectfully requested in light of the above Amendments and following remarks.

I. Objections to Claims 1 and 3

The Office Action objects to Claim 1. In response, “said keys” has been replaced with “said *plurality of keys*.” The Applicants therefore respectfully requests that the objection be withdrawn.

II. Rejection of Claims 1, 3, 7-11, 14-15, 17-19, and 26-27 under 35 U.S.C. §112, first and second paragraphs

Claims 1, 3, 7-11, 14-15, 17-19, and 26-27 have been rejected under 35 U.S.C. §112, first paragraph as purportedly failing to comply with the written description requirement. (*See Office Action, page 2.*) Claims 1, 3, 7-11, 14-15, 17-19, and 26-27 have also been rejected under 35 U.S.C. §112, second paragraph as purportedly being indefinite for failing to particularly point and distinctly claim the subject matter which applicant regards as the invention. (*See Office Action, pages 2-3.*)

II.A.) The Office Action has stated that the previously-presented Claim 1 recites “a

plurality of printable symbols: pre-conversion symbols, post-conversion symbols, and non-conversion symbols” in previous lines 3-4. The Office Action has proposed amending the claim to recite “a plurality of printable symbols, said plurality of printable symbols comprising pre-conversion symbols, post-conversion symbols, and non-conversion symbols.” (See Office Action, page 2.)

The Applicant has made this amendment as proposed by the Office Action. The Applicant therefore requests that the rejection be withdrawn.

II.B.) The Office Action has noted that Claim 1 recites “such that at least one fixed sequence of keystrokes corresponds to more than one pre-conversion symbol”. The Office Action contended: “The limitation suggests the possibility of a sequence of n keystrokes corresponding to a number of pre-conversion symbols that is different from n. It appears that the specification does not suggest such a possibility. It appears that [a recitation of] ‘such that at least one fixed sequence of keystrokes corresponds to more than one sequence of pre-conversion symbols’ is more appropriate.” (See Office Action, page 3)

The Applicant respectfully traverses the contention of the Office Action regarding specification support. For example, a “NEXT” key for a pre-conversion symbol could be part of a sequence of “n” keystrokes corresponding to a number of pre-conversion symbols other than “n” pre-conversion symbols. Also, in the case of Japanese, the number of post-conversion symbols is only less than or equal to the number of pre-conversion symbols to which they correspond. Nonetheless, for the sake of advancing prosecution, the Applicant amends the claim language in accordance with the proposal of the Office Action, without prejudice or disclaimer of claim scope.

II.C.) The Office Action noted:

“Claim 1 [previously recited] a ‘plurality of symbol-input-end symbols, each of which can be input by a keystroke on one of *a* plurality of keys, each key having a printable symbol assigned to it’ in lines 11-12. The limitation suggests the possibility of each of a plurality of symbol-input-end symbols being inputted by a keystroke on the same key or a plurality of keys.” (*See* Office Action, pages 3-4; emphasis added.) The Office Action implied that this is a basis of rejection.

The Applicant states that each key of the claimed plurality of keys could indeed generate a symbol-input-end symbol. In part for the sake of clarity, and also for the sake of claim scope, the Applicant amends Claim 1 to recite “a plurality of symbol-input-end symbols, each of which can be generated by a keystroke on *at least one of said* plurality of keys, *including at least one key* of said plurality of keys also having a printable symbol assigned to it...” For one non-limiting example, please *see* paragraph [0019] of the present Application: “As will be developed in more detail below, in the case of Chinese, a trigger sequence may be preferably embodied as comprising a keystroke causing a tone mark to be displayed *and a keystroke on any key generating a symbol-input-end symbol* inputting the tone mark.” (Emphasis added.)

The Applicant therefore requests that the rejection be withdrawn, as this claim language is supported by the Application.

The Office Action further contended: “[t]he limitation also suggests a “plurality of keys” in this particular recitation being different than a “plurality of keys” in line 2, and possibly a “plurality of keys” in addition to “a plurality of keys” in line 2. (*See* Office Action, page 4.)

The Applicant amends the claim language. The claim language now recites “a plurality of symbol-input-end symbols, each of which can be generated by a keystroke on any one of said plurality of keys, including at least one key of said plurality of keys having a printable symbol assigned to it...”

The Applicant therefore requests that the rejection be withdrawn.

II.D.) The Office Action noted:

“It also appears that the specification suggests a symbol-input end symbol being generated (note that input does not have the same scope as generated, and that line 26 of claim 1 suggests a symbol-input-end being generated) with a keystroke on a subset of the plurality of keys, with the symbol-input-end-symbol causing the post conversion corresponding to prior keystrokes to be displayed, and the keystroke causing a following pre-conversion symbol to be displayed.” (*See Office Action, page 4.*)

The Applicant amends Claim 1 to further recite: “wherein said keystroke that will convert said sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol *also displays a pre-conversion symbol corresponding to said keystroke*” (Emphasis added.)

The Applicant therefore requests that the rejection be withdrawn.

II.E.) The Office Action further contended: “It also appears that the specification does *not* support (at least for the example corresponding to FIG. 13) the keystroke on a key generating the symbol-input-end symbol having a printable symbol assigned to it (note that a printable symbol suggests either a pre-conversion symbol, a post-conversion symbol, or a non-conversion symbol.)” (*See Office Action, page 4; emphasis added.*)

The Applicant respectfully disagrees with this contention of the Office Action concerning the Application not supporting the claim language. For example, the specification states:

A printable symbol will be said to be input when a keystroke sequence is entered which includes the keystrokes required to define and display the symbol given the hardware and software of the text input system, as well as a keystroke which terminates the input of the symbol, e.g. by beginning the input of a next symbol, or

causing conversion, or causing termination or transmission of the entire entered text. The keystroke which terminates symbol input may be identical to a keystroke which serves to define and/or display the symbol, or the keystroke which terminates input of the symbol may serve no other function but symbol input termination. (See [0010].)

Furthermore:

“As will be developed in more detail below, in the case of Chinese, a trigger sequence may be preferably embodied as comprising a keystroke causing a tone mark to be displayed *and a keystroke on any key generating a symbol-in-put-end symbol* inputting the tone mark.” (See [0019].)

Please note that for the description of FIG. 13, the specification states:

At step 1365, the user presses the key 803 to enter the first letter of the next Pinyin syllable. *This keystroke displays the letter d*, which the predictive system for pre-conversion symbols proposes as the most likely choice among the symbols d, e, f, and tone mark 3 assigned to key 803. In addition, the *keystroke* at step 1365 *also generates a symbol-input-end symbol*, which applies to the tone mark displayed at step 1364. This keystroke, therefore, completes a trigger sequence. (See [0117], emphasis added.)

The Applicant respectfully states that at least these citations support the claim limitations rejected by the Office, Action above. The Applicant therefore requests that the rejection be withdrawn.

II.F.) The Office Action has also contended:

“It also appears that the specification suggests that there can only be one symbol-input-end-symbol being generated by one of a plurality of possible keystrokes that causes the post-conversion symbol corresponding to prior keystrokes to be displayed, and a pre-conversion symbol to be displayed right after the post-conversion symbol – the pre-conversion symbol corresponding to the one of the plurality of possible keystrokes. Clarification is required.” (See Office Action, page 4.)

The Applicant states that instances of symbol-input-end symbols can be generated by any

key of the claimed plurality of keys as claimed in Claim 1. Although any of these keys generate its own instance of a symbol-input-end symbol, each of these are different instances of symbol-input-ends-symbols and are functionally the same symbol-input-end symbol.

The Applicant therefore requests that the rejection be withdrawn.

II.G.) The Office Action has noted:

“Claim 1 recites ‘a second mechanism to recognize, upon input of a symbol-input-end symbol of said plurality of symbol-input-end symbols, elements of a set of trigger sequences of keystrokes and thereby trigger conversion of at least one pre-conversion symbol displayed on said display to one post conversion symbol’ in lines 16-20.” (*See Office Action, pages 4-5.*)

The Office further contends: “Again, it appears that the specification supports only one symbol-input-end symbol being generated – rather than ‘input of a symbol-input-end symbol of said plurality of symbol-input-end-symbols.’” (*See Office Action, pages 4-5.*)

In response, the Applicant amends Claim 1 to now recite: “(6) a second mechanism to recognize, upon generation of a symbol-input-end symbol of *said* symbol-input-end symbols, elements of a set of trigger sequences of keystrokes and thereby trigger conversion of at least one pre-conversion symbol displayed on said display to at least one post-conversion symbol...” (Emphasis added.) Furthermore, as discussed above, each of these are different instances of symbol-input-ends-symbols and are functionally the same symbol-input-end symbol.

The Applicant therefore requests that the rejection be withdrawn.

II.H.) The Office Action has contended:

“It is also not clear what applicant meant by a set of trigger sequences of keystrokes, and what applicant meant by elements of a set of trigger sequences or keystrokes.” (See Office Action, page 5.)

“Elements, “or “members” of a set of trigger sequence, are the individual trigger sequences in the set.

Regarding the second claim element, that of “elements of a set of trigger sequences,” the *set* of trigger sequences refers to that there can be more than one trigger sequence – “elements of a set” of trigger sequences refers to individual trigger sequences, not to individual keystrokes of a trigger sequence. In other words, the second mechanism can recognize more than one trigger sequence of keystrokes.

The Applicant therefore requests that the rejection be withdrawn.

II.I) The Office contends:

“It is also not clear how input of one symbol-input-end symbol can trigger conversion of at least one pre-conversion symbol to at least one post-conversion symbol (note that “at least one post-conversion symbol” suggests the possibility of more than one post-conversion symbols.) Clarification is required.” (See Office Action, page 5.)

The Applicants respectfully disagree that clarification is required. For support for this claimed element *please see* paragraph [0082] of the present Application:

At step 300, a sequence of keystrokes entered by the user are received by the text-entry system. This sequence is examined for the presence of trigger sequences in steps 301 and 302. The trigger sequence in this case comprises a) a keystroke which serves to display a tone mark (checked by the mechanism at step 301), followed by a keystroke which generates a symbol-input-end symbol applies to the tone mark (checked by the mechanism at step 302). If the mechanism verifies that each of these conditions holds, then it will trigger the conversion mechanism, *which at step 303 will attempt to convert pre-conversion symbols to post-conversion symbols.* (Emphasis added.)

Furthermore, *please see* FIG. 25, when at least one symbol is converted into a “block of Hanja” – that is, more than one Hanja in a sequence.

[0144] Turning then to FIG. 25, we examine in detail a non-limiting example of entry of Korean text using the preferred embodiment. . . . At step 2508, all of the cJamo for the desired block of Hanja have been entered, and the user proceeds to enter a Jamo. The intended Jamo is not correctly predicted by the text-entry system which displays another Jamo in the display 2528. The user presses the Next key to change the displayed Jamo to the intended Jamo at step 2509. In this case, a single press of the Next key was sufficient to display the intended Jamo. The user proceeds at step 2510 to enter a second Jamo. This keystroke finally completes a trigger sequence, of the second class, since the keystroke not only displays a Jamo, it also generates a symbol-input-end symbol which applies to the last symbol entered, a (non-conversion) Jamo. *Thus the conversion mechanism is triggered, and replaces the five cJamo displayed in display 2530 with the two Hanja displayed in display 2531.* This conversion did not require any explicit “convert” signal from the user, who simply continued to enter the intended Jamo and cJamo. (Emphasis added.)

Please note that the above includes multiple pre-conversion symbols being replaced by multiple post-conversion symbols, which may not be the same number of symbols. In an alternative example of FIG. 19, several pre-conversion symbols may be converted into a single post-conversion symbol.

The Applicant therefore requests that the rejection be withdrawn.

II.J.) The Office Action has contended:

“Claim 1 recites ‘wherein said set of trigger sequences of keystrokes has at least two parts’ in line 21. It appears that ‘a trigger sequence having at least two parts’ is more appropriate than ‘a set of trigger sequences of keystrokes having at least two parts.’” (See Office Action, page 5.)

In response, the Applicant amends Claim 1 to recite “wherein *each trigger sequence of keystrokes of* said set of trigger sequences of keystrokes has two parts” (Emphasis added.)

The Office Action has also contended: “Furthermore, it is not clear whether the specification supports ‘at least two parts,’ or supports only ‘two parts.’ Clarification is required.” (See Office Action, page 5.)

In response, for a purpose of furthering prosecution, the Applicant amends Claim 1 to recite “two parts.” The Applicant respectfully requests that the Office withdraw the rejection.

II.K.) The Office Action has rejected Claim 1 for a recitation of “the sequence” in previously presented Claim 1, line 22 for a lack of antecedent basis. (See Office Action, page 5.)

The Applicant amends Claim 1 to recite “said sequence *of keystrokes*.” The Applicant therefore requests that the rejection be withdrawn.

II.L.) The Office Action has noted: “Claim 1 [as previously presented] recites ‘wherein said symbol-input-ends-symbol is generated as a result of a keystroke of any printable symbol that follows a tone mark printable symbol’ in lines 26-27.” (See Office Action, pages 5-6.)

The Office Action has further contended: “The recitation suggests ‘a keystroke’ in line 26 being a keystroke that is different from ‘said keystroke’ in line 23, and different from ‘a keystroke’ in line 11”. (See Office Action, page 6.)

Claim 1 now recites: “wherein each of said symbol-input-end symbols is generated as a result of *any keystroke on any key of said plurality of keys which is assigned at least one printable symbol...*” (Emphasis added.) The Applicant therefore requests that the rejection be withdrawn.

II.M.) The Office Action has contended: “Furthermore, the specification appears to support a ‘tone mark’ as being a pre-conversion symbol rather than a printable symbol (note that printable symbol suggests the possibility of post-conversion symbol.)” (See Office Action, page 6.)

The Applicant amends Claim 1 to delete a recitation of a “tone mark.” The claim language now recites: “wherein each of said symbol-input-end symbols are generated as a result of any keystroke of any printable symbol of said plurality of keys that follows a *previously-displayed printable symbol*.” The Applicant respectfully states that the rejection has been mooted by this amendment, and that it should therefore be withdrawn.

II.N.) The Office Action contended: “Claim 7 recites ‘a third mechanism to convert a sequence of pre-conversion symbols to a post-conversion symbol upon recognition of said trigger sequences by the second mechanism’ in lines 1-3. It appears that there is only one trigger sequence that is recognized in FIG. 13 by the second mechanism for converting a sequence of pre-conversion symbols to a post conversion symbol. Clarification is required.” (*See Office Action, page 6.*)

In response, the Applicant amends Claim 7 to recite that: “The text-entry system of claim 1 further comprising a third mechanism to convert a sequence of pre-conversion symbols to a post-conversion symbol upon recognition of *said trigger sequence* of said *set of* trigger sequences by said second mechanism.” (Emphasis added.) More than one trigger sequence can be recognized. For example, please see paragraph [0088] of the present Application (shown below.)

The Applicant therefore requests that the rejection be withdrawn.

II.O.) The Office Action has contended: Claim 9 recites ‘other input symbols’ in line 2. Claim 10 recited ‘other input symbols’ in line 3. The limitation suggests ‘other input symbols’ being symbols different from printable symbols.’ Furthermore, ‘other input symbols’ is ambiguous because there is no prior recitation of input symbols.” (*See Office Action, page 6.*)

In response, the Applicant amends Claim 9 to recite: “said third mechanism performs said conversion based on a context comprising *at least one previously-inputted printable symbol*.”

The Applicant therefore requests that the rejection be withdrawn.

II.P) The Office Action has contended: “Claim 26 recites ‘wherein said post conversion symbol is set in a correspondence to a sequence of pre-conversion symbols’ in lines 1-2. It is not clear which of this correspondence and the correspondence in lines 9-10 [of Claim 1] is being used. It also appears that there is no difference between the two correspondences.” (See Office Action, page 6.)

Claim 26 is cancelled without prejudice or disclaimer.

II.Q.) The Office Action has contended: “Claim 27 recites ‘such that at least one fixed sequence of keystrokes corresponds to more than one *sequence of* pre-conversion symbols” in lines 1-2. It is not clear which of this limitation and the limitation in lines 7-8 of claim 1 is being used. It also appears that there is no difference between the two limitations.” (See Office Action, page 6; emphasis added.)

Claim 27 is cancelled without prejudice or disclaimer.

II.R.) The Examiner has proposed that the Applicant maps the elements of Claims 1, 7, 9 and 26-27 to specific teachings of the present Application. In response, the Applicant supplies an exemplary mapping, although support may also be found elsewhere in the Application as well. Please note that dependent Claims 26-27 are cancelled without prejudice or disclaimer, but the Applicant has mapped new dependent Claim 28-29, instead.

| Claim 1: Claim Language | Support on at Least: |
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| A text-entry system based on trigger sequences comprising: | [0008] “Keys and Keystrokes. <i>Typical text-entry systems</i> use mechanical keys to input symbols. For the sake of concreteness, we will define a keystroke to be an atomic act of a user with the intent of inputting a symbol (printable or non- |

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| | printable) <i>using a text-entry device to express that intent.</i> We will further define the physical means used to express the intent as a key. The physical form of both key and keystroke depends on the input device.” (Emphasis added.) |
| 1) a plurality of keys, | [0061] FIG. 18 is telephone keypad labeled for the entry of Hiragana, cHiragana, and Kanji using the preferred embodiment). |
| 2) a plurality of printable symbols, said plurality of printable symbols comprising pre-conversion symbols, post-conversion symbols and non-conversion symbols, | <p>[0006] “Printable and non-printable symbols. A printable symbol is a symbol which is displayed as text in normal writing. For instance, the letter a in English is a printable symbol. In the following it will be useful to also consider non-printable symbols. For example, the delete button may be said to generate the non-printable "delete" symbol.”</p> <p>[0012] “Pre-conversion, post-conversion, and non-conversion symbols. Natural languages based in whole or in part on ideographic characters such as Chinese, Japanese, and Korean may be input into a computer in a two-phase process, each phase involving a set of symbols to be called pre-conversion and post-conversion symbols respectively. In the first phase, symbols from a pre-conversion set of symbols are input, and in a second phase these symbols are converted into the post-conversion ideographic characters. Well-known pre-conversion symbol sets for Chinese include Hanyu Pinyin (Latin letters with tone marks), other Romanizations schemes, or Zhuyin (also known as Bopomofo. In the case of Japanese, the ideographic Kanji symbols are entered by first entering strings of pre-conversion symbols typically composed of Latin letters or Hiragana, and then converted to Kanji in a second conversion phase. In the case of Korean, the pre-conversion symbols are typically Latin letters or Jamo, and the ideographic Hanja are produced in a second conversion phase. Text entry for some languages may involve symbols which are</p> |

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| | <p>neither pre-conversion nor post-conversion symbols. For example, punctuation symbols are not typically entered with the intent of being converted to other symbols, nor are they typically the result of a conversion process. Symbols which are not converted into other symbols will be called non-conversion symbols.”</p> <p>[0013] “Note that the characterization of a symbol as a pre-, post- or non-conversion symbol is not intrinsic to the symbol, but rather depends on the text-entry device. For instance, though in typical devices punctuation symbols are non-conversion symbols, they could be pre-conversion symbols in a device which e.g. replaces the sequence :-) with a pictorial representation of a smiling face when the punctuation sequence is entered.”</p> |
| such that at least one of said plurality of keys is assigned more than one of said pre-conversion symbols, and | <i>For Example</i> , in Fig. 8, the key 1802 is assigned three pre-conversion symbols: “ABC”. |
| such that at least one fixed sequence of keystrokes corresponds to more than one sequence of pre-conversion symbols, and | <i>Please see</i> FIG. 14, wherein in step 1403, a fixed sequence of keystrokes “426” corresponds to “gao”, whereas in step 1404, the fixed sequence of keystrokes 426Next key corresponds to “gan” – <i>i.e.</i> , “426” can correspond to multiple pre-conversion symbols |
| each of said post-conversion symbols being set in a correspondence to at least one pre-conversion symbol, | [0082] “At step 300, a sequence of keystrokes entered by the user are received by the text-entry system. This sequence is examined for the presence of trigger sequences in steps 301 and 302. The trigger sequence in this case comprises a) a keystroke which serves to display a tone mark (checked by the mechanism at step 301), followed by a keystroke which generates a symbol-input-end symbol applies to the tone mark (checked by the mechanism at step 302). If the mechanism verifies that each of these conditions holds, then it will trigger the conversion mechanism, which at step 303 will attempt to convert pre-conversion symbols to post-conversion symbols”. |

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| <p>3) a plurality of symbol-input-end symbols, each of which can be generated by a keystroke on at least one of said plurality of keys, including at least one key of said plurality of keys also having a printable symbol assigned to it, wherein each said symbol-input-end symbol is a non-printable symbol-input-end symbol;</p> | <p>[0080] “Basic Operations Turning now to FIG. 2, we study the basic operations of a text-entry system based on trigger sequences according to this invention. A natural language text-entry system based on trigger sequences comprises 1) a plurality of keys, 2) <i>a plurality of pre-conversion symbols</i>, 3) a plurality of post-conversion symbols, 4) a plurality of symbol-input-end symbols, 5) a display to display symbols, 6) a first mechanism to display said pre-conversion symbols in response to keystrokes, and 7) a second mechanism to recognize trigger sequences and thereby triggering conversion of a plurality of pre-conversion symbols displayed by the first mechanism to a plurality of the post-conversion symbols, the trigger sequences comprising a subsequence of keystrokes, the subsequence comprising at least two of keystrokes such that the first of keystrokes in the subsequence causes the first mechanism to display at least one pre-conversion symbol, and the second keystroke in the subsequence generates at least one symbol-input-end symbol, where the generated symbol-input-end symbol applies to at least one pre-conversion symbol displayed by the first mechanism in response to the first keystroke of the trigger sequence whereby conversion of a plurality of pre-conversion symbols to a plurality of post-conversion symbols is effected without the need for a keystroke on a dedicated convert key.” (Emphasis added.)</p> <p>[0029] “Next keys. A keystroke on a Next key advances in the symbol displayed as the result of a keystroke on a key with multiple symbols are assigned. Next key advance is distinguished from multi-tap advance in that in a multi-tap system the displayed symbol is advanced by repeated keystrokes on the same key which displayed the first symbol, whereas in a Next-key system, the key which advances the display is distinct from the key which displayed the symbol to be advanced. Some Next-key systems</p> |
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| | <p>are equipped with several Next keys, each of which may advance the display of a different class of symbols.”</p> <p><i>Also, please see</i> FIG. 21, wherein at least one key has a printable symbol assigned to it.</p> |
| 4) a display to display said plurality of printable symbols, | <p>[0007] “Display. A printable symbol may be displayed in the course of text entry. By display we mean “presentation to the senses of the user.” In typical applications of the present invention, the display would be visual, and for the sake of concreteness in this disclosure, visual display is assumed. However, the display might be an auditory display in the case of interactive voice response systems, tactile in the case of text input systems for the blind, etc.”</p> <p>[0080] “Basic Operations Turning now to FIG. 2, we study the basic operations of a text-entry system based on trigger sequences according to this invention. A natural language text-entry system based on trigger sequences comprises 1) a plurality of keys, 2) a plurality of pre-conversion symbols, 3) a plurality of post-conversion symbols, 4) a plurality of symbol-input-end symbols, 5) a <i>display</i> to display symbols,”</p> <p><i>Also, please see</i>, for example, [0017]: “An important observation is that though gangl is displayed in the display 1416, the syllable has not yet been fully input and a trigger sequence has not yet been completed.”</p> |
| 5) a first mechanism to display said plurality of printable symbols in response to keystrokes, and | <p>“[0080] Basic Operations Turning now to FIG. 2, we study the basic operations of a text-entry system based on trigger sequences according to this invention. A natural language text-entry system based on trigger sequences comprises 1) a plurality of keys, 2) a plurality of pre-conversion symbols, 3) a plurality of post-conversion symbols, 4) a plurality of symbol-input-end symbols, 5) a display to display symbols, 6) a first mechanism to display said</p> |

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| | pre-conversion symbols in response to keystrokes...” |
| 6) a second mechanism to recognize, upon generation of a symbol-input-end symbol of said plurality of said symbol-input-end symbols, inputted elements of a set of trigger sequences of keystrokes and thereby trigger conversion of at least one pre-conversion symbol displayed on said display to at least one post-conversion symbol, | <p>[0080] “Basic Operations Turning now to FIG. 2, we study the basic operations of a text-entry system based on trigger sequences according to this invention. A natural language text-entry system based on trigger sequences comprises 1) a plurality of keys, 2) a plurality of pre-conversion symbols, 3) a plurality of post-conversion symbols, 4) a plurality of symbol-input-end symbols, 5) a display to display symbols, 6) a first mechanism to display said pre-conversion symbols in response to keystrokes, and 7) a second mechanism to recognize trigger sequences and thereby triggering conversion of a plurality of pre-conversion symbols displayed by the first mechanism to a plurality of the post-conversion symbols, the trigger sequences comprising a subsequence of keystrokes, the subsequence comprising at least two of keystrokes such that the first of keystrokes in the subsequence causes the first mechanism to display at least one pre-conversion symbol, and the second keystroke in the subsequence generates at least one symbol-input-end symbol, where the generated symbol-input-end symbol applies to at least one pre-conversion symbol displayed by the first mechanism in response to the first keystroke of the trigger sequence whereby conversion of a plurality of pre-conversion symbols to a plurality of post-conversion symbols is effected without the need for a keystroke on a dedicated convert key.”</p> <p><i>Also, please see at least FIG. 13, [0116] “At step 1365, the user presses the key 803 to enter the first letter of the next Pinyin syllable. This keystroke displays the letter d, which the predictive system for pre-conversion symbols proposes as the most likely choice among the symbols d,e,f, and tone mark 3 assigned to the key 803. In addition, the keystroke at step 1365 also generates a symbol-input-end symbol,</i></p> |

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| | <p>which applies to the tone mark displayed at step 1364. This keystroke, therefore, completes a trigger sequence. The trigger sequence triggers a conversion. The predictive system for post-conversion symbols chooses the Hanzi shown in display 1385 as the most likely to be intended by the Pinyin ti2 which is shown in the display 1384.”</p> <p><i>Also, please see at least FIG. 14, [0117]: “An important observation is that though gang1 is displayed in the display 1416, the syllable has not yet been fully input and a trigger sequence has not yet been completed. Step 1407 completes the trigger sequence, causing conversion of gang1 to the first Hanzi predicted by the predictive system on post-conversion symbols, and display of the letter c by the predictive system for pre-conversion symbols. In this case, the predicted Hanzi is not the Hanzi intended by the user. The user thus presses C-Next (C), at step 1408 to advance to the next Hanzi. Note carefully that 1) the keystroke at step 1407 issued a symbol-input-end symbol which refers to the last pre-conversion symbol entered (the tone mark 1) but does not end the input of the post-conversion Hanzi shown in the display 1417. 2) C-Next issues a symbol-in-put-end symbol which applies to the last pre-conversion symbol displayed but not to the last post-conversion symbol displayed. Thus, The keystroke on C-Next at step 1408 causes a new Hanzi to be displayed, but that Hanzi would not be definitely input until a further Hanzi is displayed. That is, symbol-input-end symbols apply to the last pre- or post-conversion symbol displayed but not in-put, as appropriate.”</i></p> |
| wherein each trigger sequence of keystrokes of said set of trigger sequences of keystrokes has two parts: | [0081] “According, the text entry method based on trigger sequences receives 200 a keystroke sequence entered by the user and received by the mechanism. The mechanism 201 to recognize trigger sequences in the input keystroke sequence examines the input keystroke sequence to determine if a trigger sequence has been |

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| | <p>received. If so, then the conversion mechanism 202 is triggered. The conversion mechanism converts selected pre-conversion symbols into post-conversion symbols inasmuch as is possible or desired according to other aspects of the invention. If any conversion is possible, the conversion includes processing of at least any pre-conversion symbols displayed as result of an element of the trigger sequence.”</p> |
| <p>a) a first part of each said sequence of keystrokes that corresponds to said at least one post-conversion symbol; and</p> | <p>[0081] “[Accordingly], the text entry method based on trigger sequences receives 200 a keystroke sequence entered by the user and received by the mechanism. The mechanism 201 to recognize trigger sequences in the input keystroke sequence examines the input keystroke sequence to determine if a trigger sequence has been received. If so, then the conversion mechanism 202 is triggered. The conversion mechanism converts selected pre-conversion symbols <i>into post-conversion symbols</i> inasmuch as is possible or desired according to other aspects of the invention. If any conversion is possible, the conversion includes processing of at least any pre-conversion symbols displayed as result of an element of the trigger sequence.”</p> <p>[0144] Turning then to FIG. 25, we examine in detail a non-limiting example of entry of Korean text using the preferred embodiment.... At step 2508, all of the cJamo for the desired block of Hanja have been entered, and the user proceeds to enter a Jamo. The intended Jamo is not correctly predicted by the text-entry system which displays another Jamo in the display 2528. The user presses the Next key to change the displayed Jamo to the intended Jamo at step 2509. In this case, a single press of the Next key was sufficient to display the intended Jamo. The user proceeds at step 2510 to enter a second Jamo. This</p> |

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| | <p>keystroke finally completes a trigger sequence, of the second class, since the keystroke not only displays a Jamo, it also generates a symbol-input-end symbol which applies to the last symbol entered, a (non-conversion) Jamo. <i>Thus the conversion mechanism is triggered, and replaces the five cJamo displayed in display 2530 with the two Hanja displayed in display 2531.</i> This conversion did not require any explicit "convert" signal from the user, who simply continued to enter the intended Jamo and cJamo. (Emphasis added.)</p> <p><i>Please note</i> that the above includes multiple pre-conversion symbols being replaced by multiple post-conversion symbols, which may not be the same number of symbols. In an alternative example of FIG. 19, several pre-conversion symbols may be converted into a single post-conversion symbol.</p> |
| b) a second part of said sequence of keystrokes including said keystroke that will convert said sequence of keystrokes into at least one post-conversion symbol and at a same time display said at least one post-conversion symbol, | <p>[0081] “[Accordingly], the text entry method based on trigger sequences receives 200 a keystroke sequence entered by the user and received by the mechanism. The mechanism 201 to recognize trigger sequences in the input keystroke sequence examines the input keystroke sequence to determine if a trigger sequence has been received. If so, then the conversion mechanism 202 is triggered. <i>The conversion mechanism converts selected pre-conversion symbols into post-conversion symbols</i> inasmuch as is possible or desired according to other aspects of the invention. If any conversion is possible, the conversion includes processing of at least any pre-conversion symbols displayed as result of an element of the trigger sequence.”</p> |
| wherein said keystroke that will convert said sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol | <p><i>Please see at least FIG. 13, [0116]</i> “At step 1365, the user presses the key 803 to enter the first letter of the next Pinyin syllable. This keystroke displays the letter d, which the</p> |

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| <p>also displays a pre-conversion symbol corresponding to said keystroke,</p> | <p>predictive system for pre-conversion symbols proposes as the most likely choice among the symbols d,e,f, and tone mark 3 assigned to the key 803. In addition, the keystroke at step 1365 also generates a symbol-input-end symbol, which applies to the tone mark displayed at step 1364. This keystroke, therefore, completes a trigger sequence. The trigger sequence triggers a conversion. The predictive system for post-conversion symbols chooses the Hanzi shown in display 1385 as the most likely to be intended by the Pinyin ti2 which is shown in the display 1384.”</p> <p><i>Also, please see, FIG. 14 [0117]: “Note carefully that 1) the keystroke at step 1407 issued a symbol-input-end symbol which refers to the last pre-conversion symbol entered (the tone mark 1) but does not end the input of the post-conversion Hanzi shown in the display 1417. 2) C-Next issues a symbol-in-put-end symbol which applies to the last pre-conversion symbol displayed but not to the last post-conversion symbol displayed. Thus, The keystroke on C-Next at step 1408 causes a new Hanzi to be displayed, but that Hanzi would not be definitely input until a further Hanzi is displayed. That is, symbol-input-end symbols apply to the last pre- or post-conversion symbol displayed but not in-put, as appropriate.”</i></p> |
| <p>wherein said pre-conversion symbol, corresponding to said keystroke that will convert said trigger sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol, is itself not converted at said same time; and</p> | <p><i>Please see at least FIG. 13, [0116] “At step 1365, the user presses the key 803 to enter the first letter of the next Pinyin syllable. This keystroke displays the letter d, which the predictive system for pre-conversion symbols proposes as the most likely choice among the symbols d,e,f, and tone mark 3 assigned to the key 803. In addition, the keystroke at step 1365 also generates a symbol-input-end symbol, which applies to the tone mark displayed at step 1364. This keystroke, therefore, completes a trigger sequence. The trigger sequence triggers a conversion. The predictive system for post-conversion symbols chooses the Hanzi shown in</i></p> |

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| | <p>display 1385 as the most likely to be intended by the Pinyin ti2 which is shown in the display 1384.”</p> <p><i>Also, please see, FIG. 14 [0117]: “Note carefully that 1) the keystroke at step 1407 issued a symbol-input-end symbol which refers to the last pre-conversion symbol entered (the tone mark 1) but does not end the input of the post-conversion Hanzi shown in the display 1417. 2) C-Next issues a symbol-in-put-end symbol which applies to the last pre-conversion symbol displayed but not to the last post-conversion symbol displayed. Thus, The keystroke on C-Next at step 1408 causes a new Hanzi to be displayed, but that Hanzi would not be definitely input until a further Hanzi is displayed. That is, symbol-input-end symbols apply to the last pre- or post-conversion symbol displayed but not in-put, as appropriate.”</i></p> |
| <p>wherein each of said symbol-input-end symbols is generated as a result of any keystroke on any key of said plurality of keys which is assigned at least one printable symbol that follows a previously-displayed printable symbol.</p> | <p>[0019] “As will be developed in more detail below, in the case of Chinese, a trigger sequence may be preferably embodied as comprising a keystroke causing a tone mark to be displayed and a keystroke on <i>any key</i> generating a symbol-in-put-end symbol inputting the tone mark.”</p> <p>[0115] “In the present non-limiting example of Chinese, a set of keystrokes which meet these criteria are comprised of the last keystroke causing a tone mark to be displayed, <i>followed by a keystroke on any other key but the Next key 812</i>, as only 812 does not generate a symbol-input-end symbol which applies to a pre-conversion symbol. Where no such trigger sequences to be found, the method would return, in step 104, to step 100.”</p> <p>[0119] “An alternate embodiment for Chinese will now be described to show how the present invention can be implemented if multi-tap rather than Next key advance is used for pre-conversion symbols, a Next key is used for post-conversion symbol advance, and a fixed order is</p> |

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| | <p>used for both pre-conversion and post-conversion symbols. ... If a multi-tap advance is used for pre-conversion symbols, then the assignment of (pre-conversion) symbol-in-put-end symbols to keys is different from the assignment if Next key advance is used. As described above, in a multi-tap system, multiple keystrokes on the same key may correspond to one, or more, pre-conversion symbols. If multiple pre-conversion symbols are intended to be in-put, then some mechanism should be available to issue symbol-input-end symbols to partition the multiple keystrokes on the same key into distinct symbols. In typical implementations there is either a) a time-out whereby if the user waits long enough after a keystroke in the multi-press sequence, then the system generates a symbol-input-end symbol or b) a time-out-kill key which ends the time-out, issuing a symbol-input-end symbol. In a multi-tap system, a sequence of multiple keystrokes on the same key is ended when the user performs a keystroke on any other key. In this case, the other key issues a (pre-conversion) symbol-input-end symbol, in addition to other functions it might potentially have.”</p> |
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| Claim 7: Claim Language: | Support on at Least: |
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| <p>7. The text-entry system of claim 1 further comprising a third mechanism to convert said pre-conversion symbols to said post-conversion symbols.</p> | <p>[0088] “The second class contains trigger sequences which are at least three keystrokes in length and comprised of a keystroke causing a cJamo symbol to be input, followed by a keystroke causing a non-conversion symbol to be additionally displayed, further followed by a keystroke generating a symbol-input-end symbol. Referring to FIG. 5, we provide an overview of the operation of this system. At step 500, a keystroke sequence is received for examination for the presence of trigger sequences. The mechanism to recognize trigger</p> |

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| | sequences looks for sequences from one of two classes. For the first class, at step 501, the input sequence is examined for a keystroke which caused a cJamo to be displayed. The sequence is then further examined 502 for a subsequent keystroke on a key to which no cJamo are assigned which generated a symbol-in-put-end symbol. If such a pair of keystrokes is found in the given order in the sequence, then the conversion mechanism is triggered 503.” |
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| Claim 9: Claim Language | Support on at Least: |
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| The text-entry system of claim 7 further characterized in that said third mechanism performs said conversion based on a context comprising at least one previously-input pre-conversion symbol. | <i>See</i> [0116]: “Turning now to FIG. 13...The user proceeds, at step 1364, to press the (pre-conversion) Next key 812 to display the tone mark 2. Note carefully that this keystroke does not complete a trigger sequence. It serves to display a tone mark, but the Next key 812 does not generate a symbol-input-end symbol. Thus, the tone mark is displayed, but not input at this point. At step 1365, the user presses the key 803 to enter the first letter of the next Pinyin syllable. This keystroke displays the letter d, which the predictive system for pre-conversion symbols proposes as the most likely choice among the symbols d,e,f, and tone mark 3 assigned to the key 803. In addition, the keystroke at step 1365 also generates a symbol-input-end symbol, which applies to the tone mark displayed at step 1364. This keystroke, therefore, completes a trigger sequence. The trigger sequence triggers a conversion.” |

Claims 26 and 27: cancelled.

| Claim 28: Claim Language: | Support on at Least: |
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| The text-entry of claim 1, wherein said symbol-input-end symbol also inputs said previously- | [0019] “As will be developed in more detail below, in the case of Chinese, a trigger sequence |

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| displayed printable symbol for recognition by said second mechanism. | may be preferably embodied as comprising a keystroke causing a tone mark to be displayed and a keystroke on any key generating a symbol-in-put-end symbol inputting the tone mark.” |
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| Claim 29: Claim Language: | Support on at Least: |
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| The text-entry system of claim 1, wherein a further condition for said symbol-input-end symbol being generated is only if there is also displayed said previously-displayed printable symbol. | [0010] A printable symbol will be said to be input when a keystroke sequence is entered which includes the keystrokes required to define and display the symbol given the hardware and software of the text input system, as well as a keystroke which terminates the input of the symbol, e.g. by beginning the input of a next symbol, or causing conversion, or causing termination or transmission of the entire entered text. The keystroke which terminates symbol input may be identical to a keystroke which serves to define and/or display the symbol, or the keystroke which terminates input of the symbol may serve no other function but symbol input termination. For instance, in a standard multi-tap system for a telephone keypad, one keystroke sequence to input the printable sequence ba . . . begins 22T2. . . where each 2 represents a keystroke on the 2 key, and T represents a keystroke on the time-out kill key. Once the keystroke sequence 22 is entered, the letter b is displayed. However, the letter b cannot yet be said to be definitively input since another keystroke on 2 would change the display to the letter c. It is only after the non-printing symbol T is entered that the letter b can said to be input. Another keystroke sequence for inputting the printable sequence ba . . . in a multi-tap system begins 22W2. . . where each 2 represents a keystroke on the 2 key, and W represents the user waiting until a time-out period has expired. |

The Office Action has requested that the Applicant review “withdrawn” Claims 2, 4-6, and 12 for 35 U.S.C. §112 issues. The Applicant has done so.

As the Applicant contends that these claims are also pending, the Applicant has also provided a mapping for these claims, as well, as well as amended Claim 11:

| Claim 3: Claim Language: | Support on at Least |
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| The text-entry system of claim 1 further characterized in that: 1) said pre-conversion symbols comprise cHiragana, 2) said post-conversion symbols comprise Kanji, and 3) said non-conversion symbols comprise Hiragana. | [0014] “cHiragana, cLatin, and cJamo symbols. Appreciation of this invention as a whole hinges on the appreciation of the distinction between display and input. Similarly, appreciation of several aspects of embodiments of the invention hinges on appreciation of the distinction between symbols meant to appear in output text as such, and symbols which may be otherwise the same, but are meant to be converted to still other symbols. cHiragana are symbols used in the preferred embodiment as applied to Japanese. According to the invention, to each Hiragana there is a corresponding cHiragana. Hiragana are distinguished from cHiragana in the preferred embodiment in that Hiragana are meant to be represented directly in output text, and are thus non-converting symbols, whereas cHiragana are pre-conversion symbols meant to be converted during the course of text entry to post-conversion Kanji symbols. In typical implementations of this invention, the cHiragana have display characteristics which mark them as distinct from Hiragana. In the same way, cLatin letters are Latin letters entered with the intent of being converted, and are marked in the display so as to distinguish them from Latin letters, and cJamo are pre-conversion symbols entered with the intent of being converted and marked distinctively from non-converting Jamo.” |

| Claim 11: Claim Language | Supported on at Least |
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| <p>The text-entry system of claim 1 further comprising at least one Next key of said plurality of keys for incrementing symbols in an ordered list containing more than one element, said Next key characterized in that a keystroke on said Next key does not generate a symbol-input-end symbol.</p> | <p>[0144] “The correct cJamo is not presented by the prediction system, so at the next step 2503, the user presses the Next key to display the correct cJamo in dis2523. Continuing in this way, the user enters the cJamo required to specify a second Hanja in steps 2504-2507. The reader may verify that at none of these steps is a trigger sequence entered. At step 2508, all of the cJamo for the desired block of Hanja have been entered, and the user proceeds to enter a Jamo. The intended Jamo is not correctly predicted by the text-entry system which displays another Jamo in the display 2528. The user presses the Next key to change the displayed Jamo to the intended Jamo at step 2509. In this case, a single press of the Next key was sufficient to display the intended Jamo. The user proceeds at step 2510 to enter a second Jamo. This keystroke finally completes a trigger sequence, of the second class, since the keystroke not only displays a Jamo, it also generates a symbol-input-end symbol which applies to the last symbol entered, a (non-conversion) Jamo. Thus the conversion mechanism is triggered, and replaces the five cJamo displayed in display 2530 with the two Hanja displayed in display 2531. This conversion did not require any explicit "convert" signal from the user, who simply continued to enter the intended Jamo and cJamo.”</p> |

| Claim 15: Claim Language | Supported on at Least |
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| <p>The text-entry system of claim 3 further characterized in that a plurality of said pre-conversion symbols are assigned to said keys in a substantially Iroha ordering.</p> | <p>[0138] “To appreciate how a keypad labeled in a substantially Iroha ordering can be used to enter Japanese text, we turn to FIG. 23 to discuss a non-limiting example, using the keypad of FIG. 21. In this example, we see the use of three separate Next keys, a) a Next key (denoted N), corresponding to part 2112 of FIG. 21 and used to advance the display of cHiragana, a H-Next</p> |

key (denoted H), corresponding to part 2100 of FIG. 21 and used to advance the display of Hiragana, and a C-Next key (denoted C), corresponding to part 2111 of FIG. 21, and used to advance the display of Kanji. The first column of this figure gives the keystrokes and the second column the resulting display. At step 2301 the user performs a keystroke on key 2108 to display the Hiragana symbol shown in display 2321. At step 2302 the user performs a keystroke on key 2106 to input the previously displayed Hiragana, and display the next desired Hiragana in display 2322. At step 2303, the user performs a keystroke on key 2109 displaying a Hiragana symbol as shown in display 2323. In this case, the user intended to input a cHiragana, which was not correctly predicted by the prediction mechanism. Thus, at step 2304 the user presses key 2112 to advance the display to the first cHiragana in the order given by the predictive mechanism. As this is not the intended cHiragana, the user, at step 2305, presses key 2112 to further advance the display to the next cHiragana predicted by the predictive mechanism. At step 2306, the user presses key 2102 to input the next intended cHiragana. In this case the predictive mechanism does select the intended cHiragana, as displayed in display 2326. At step 2307, the user again presses key 2102, this time with the intent of inputting a Hiragana. The predictive system chooses a Hiragana for display, as shown in display 2327. However, this is not the intended Hiragana. Thus, at step 2308, the user presses key 2100 to advance the display to the next, and intended, Hiragana, as shown in display 2328. At step 2309, the user presses key 2107 which displays a cHiragana as shown in display 2309. This keystroke completes a trigger sequence. Thus, the two cHiragana shown in display 2328 are converted to a Kanji, as shown in display 2329. This is not the Kanji intended by the user who proceeds, at step 2310 to press key 2311 (C-Next) to advance the display to the next Kanji given by the mechanism. The final state of the

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| | display is shown in display 2330.” |
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Also, please note the following definitions:

Subsequence: a subsequence is part of a sequence. For example, a subsequence of a trigger sequence is at least part of the trigger sequence.

Subsequent Subsequence: a part of a sequence that occurs after some point in a sequence, such as in a trigger sequence.

II.S) The Applicant respectfully states that the above amendments and traversals address the above rejections. Accordingly, the Applicant respectfully requests that the rejections under 35 U.S.C. §112, first and second paragraphs, be withdrawn, and that these claims be allowed to issue.

III. Rejection of Claims 1, 7, 10-11, 18-19, and 26-27 under 35 U.S.C.

§102(b)

Claims 1, 7-11, 18-19, and 26-27 have been rejected under 35 U.S.C. §102(b) over U.S. Patent No. 5,952,942 to Balakrishnan *et al.* (“Balakrishnan.”) Please note that Claims 8-9 are rejected under both 35 U.S.C. §102(b) and 35 U.S.C. §103(a), and Claim 14 is rejected under 35 U.S.C. §103(a). Also, please note that pending dependent Claims 3 and 15 were rejected neither under 35 U.S.C. §102(b) and 35 U.S.C. §103(a). Claims 26-27 are cancelled without prejudice or disclaimer.

Balakrishnan is generally directed to a method and device for input of text messages from a keypad. In Balakrishnan, a dictionary is searched for candidate combinations of characters corresponding to keys activated. The candidate combinations are rank ordered. (*See Abstract.*) Furthermore, in Balakrishnan, a purported advantage of Balakrishnan is that “it allows for ambiguous input and converts than input to a word or alphanumeric value that has the highest probability of success.” (*See col. 6, lines 14-18.*)

The Examiner has contended that “[n]ote that the claim [as previously presented] does not require displaying pre-conversion symbol d [of the present Application] in box 1385 of Fig. 13.” (*See Office Action, page 10.*)

The Applicant amends Claim 1 to further recite: “wherein said keystroke that will convert said sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol *also displays a pre-conversion symbol corresponding to said keystroke...*” (Emphasis added.) A display of the pre-conversion symbol

such as the pre-conversion symbol “d” in box 1385 can be one example of a display of a pre-conversion symbol as claimed in Claim 1.

The Applicant respectfully states that the above is not disclosed in Balakrishnan. In Balakrishnan, “[w]hen the desired word is displayed in the left-most portion in the display area 17, it can be selected by pressing key 19 briefly (less than the predetermined time) and releasing it. This action delivers the word to memory 32 and to text display area 15 as described above.” (See col. 17, lines 17-21.)

Alternatively, in Balakrishnan:

In standard entry mode 300, a user enters the pinyin of each Chinese character he wants to input by using the telephone keys marked a,b,c,d, . . . in the same manner as described above with respect to entry of English words. (For verification, a digit string is displayed in a small window 13 which is located at the top right of the display 14). He can press key 18 to delete a digit that is wrong. When finished, he presses key 19. The program then proceeds to character selection mode 302 and displays in character selection area 17 of the display the top 10 Chinese characters that have the pinyin entered. The characters are rank ordered based on the language model data 34. A number from 0 to 9 is displayed under each Chinese character. *The user can select the Chinese character he wants to input by pressing its corresponding number displayed.* For example, if the Chinese character marked by 3 is the desired one, he simply presses the key marked by 3 *nto [sic.]* put it in the text area 15 of the display 14 and store it in memory 32. *The program then returns to standard entry mode 300.* (See Balakrishnan, col. 8, lines 49-68; emphasis added.)

However, the Applicant has been unable to find within the cited portions of Balakrishnan a teaching or a disclosure of “wherein said keystroke that will convert said sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol *also displays a pre-conversion symbol corresponding to said keystroke...*” as claimed in currently amended Claim 1. Although, in Balakrishnan, a key may be pressed to put text into a display, the Applicant has been unable to find within cited portions of Balakrishnan a

disclosure that a symbol corresponding to the pressed key is *also* displayed. Balakrishnan does not disclose Claim 1 as currently amended.

Claim 1 also further recites “wherein said pre-conversion symbol, corresponding to said keystroke that will convert said trigger sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol, is itself not converted at said same time.” As Balakrishnan does not disclose “wherein said pre-conversion symbol corresponding to said keystroke that will convert said trigger sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol”, as explained above, therefore Balakrishnan also further does not disclose “wherein said pre-conversion symbol corresponding to said keystroke that will convert said trigger sequence of keystrokes into said at least one post-conversion symbol and at said same time display said at least one post-conversion symbol,” as claimed in Claim 1.

In light of the foregoing Amendments and remarks, the Applicant hereby respectfully states that a 35 U.S.C. §102(b) rejection of independent Claim 1 is not sustained, nor has a rejection of dependent Claims 7, 10-11, and 18-19, which depend upon Claim 1. Accordingly, the Applicant respectfully requests that the rejection of dependent Claims 1, 7, 10-11, and 18-19 under 35 U.S.C. §102(b) be withdrawn, and these claims be allowed to issue.

The Applicant also respectfully objects to some of the terminology used in various rejections of the present Office Action. In a 35 U.S.C. §102(b) rejection, a reliance upon ‘suggestion’ is not proper, and is an error. Indeed, according to M.P.E.P. §2131 *Anticipation: To Anticipate A Claim, The Reference Must Teach Every Element of the Claim*: “A claim is anticipated only if each and every element as set forth in the claim is found, *either expressly or inherently* described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d

628, 631 USPQ2 1051, 1053 (Fed. Cir. 1987; emphasis added). The Applicant respectfully states that reliance upon a “suggestion” of a claim element by the Office Action, such as in the contention of the Office Action of “step 193 FIG. 5 *suggests* other elements of the set of trigger sequences of keystrokes”) on page 9 of the Office Action for a 35 U.S.C. §102(b) rejection of Claim 1 does not constitute an element of a legally-sufficient *prima facie* rejection.

Accordingly, the Applicant respectfully requests that the rejections under 35 U.S.C. §102(b) be withdrawn, as a sufficient *prima facie* case of anticipation has not been presented, and that these claims be allowed to issue.

In light of the foregoing Amendments and remarks, the Applicant hereby respectfully states that a *prima facie* 35 U.S.C. §102(b) rejection of independent Claim 1 is not sustained, nor has a rejection of dependent Claims 7, 10-11, and 18-19, which depend upon Claim 1. Accordingly, the Applicant respectfully requests that the rejection of dependent Claims 1, 7, 10-11, and 18-19 under 35 U.S.C. §102(b) be withdrawn, and these claims be allowed to issue.

IV. Rejection of Claims 8-9, and 14 under 35 U.S.C. §103(a)

Claims 8-9 and 14 have been rejected under 35 U.S.C. §103(a) over Balakrishnan. Claims 8, 9 and 14 also depend upon Claim 1, which should be deemed in condition for allowance, as discussed above. Therefore, Claims 8-9 and 14 should also be deemed in condition for allowance. Accordingly, the Applicant respectfully requests that the rejection of dependent Claims 8, 9, and 14 under 35 U.S.C. §103(a) be withdrawn, and these claims be allowed to issue.

CONCLUSION

The Applicant has now made an earnest attempt to place this Application in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, the Applicant respectfully requests full allowance of Claims 1, 3, 7-11, 14-15, 17-19, and 28-29.

Should the Examiner deem that any further amendment is desirable to place this Application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

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